

**To:** Timothy Spisak[tspisak@blm.gov]  
**From:** Kent Hoffman  
**Sent:** 2017-05-22T09:13:12-04:00  
**Importance:** Normal  
**Subject:** Fwd: GSENM Executive Summary and Initial Data Request  
**Received:** 2017-05-22T09:13:23-04:00  
[mime-attachment.html](#)  
[ATT00001.htm](#)  
[CLEAN Executive Summary for GSENM Ruhs edits Mali edits 5.19.2017.docx](#)  
[ATT00002.htm](#)  
[InitialDataRequestRelatedtoReviewofNationalMonuments GSENM.docx](#)  
[ATT00003.htm](#)  
[mime-attachment.html](#)  
[ATT00004.htm](#)  
[Additional Information Requested on Grand Staircase-Escalante NM.docx](#)  
[ATT00005.htm](#)  
[mime-attachment.html](#)  
[ATT00006.htm](#)

I(b)(5) DPP [REDACTED]. We provided a fair amount of data regarding the huge coal reserves (and the proposed mine that was killed by the monument designation) and the prospects for oil & gas exploration. I(b)(5) DPP [REDACTED]  
[REDACTED].

Kent Hoffman  
Deputy State Director, Lands and Minerals  
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Begin forwarded message:

**From:** Anita Bilbao <[abilbao@blm.gov](mailto:abilbao@blm.gov)>  
**Date:** May 20, 2017 at 7:53:54 AM MDT  
**To:** [ajossie@blm.gov](mailto:ajossie@blm.gov), [acurtis@blm.gov](mailto:acurtis@blm.gov), [aginn@blm.gov](mailto:aginn@blm.gov), [l50porte@blm.gov](mailto:l50porte@blm.gov), [tashcrof@blm.gov](mailto:tashcrof@blm.gov), [cstaszak@blm.gov](mailto:cstaszak@blm.gov)  
**Cc:** [eroberso@blm.gov](mailto:eroberso@blm.gov), [jmendez@blm.gov](mailto:jmendez@blm.gov), [khoffman@blm.gov](mailto:khoffman@blm.gov), [mjrichardson@blm.gov](mailto:mjrichardson@blm.gov), [lbird@blm.gov](mailto:lbird@blm.gov), [rrsutherland@blm.gov](mailto:rrsutherland@blm.gov)  
**Subject: Fwd: GSENM Executive Summary and Initial Data Request**

FYI transmittal of GSENM info. I shared WO edits separately to Allison and Cindy.

We will see what comes next together. I'd like Allison to be our POC and have her coordinate any questions (thank you, Allison!).

Enjoy the weekend, everyone! Anita

Sent from my iPhone

**From:** "Bowman, Randal" <[randal\\_bowman@ios.doi.gov](mailto:randal_bowman@ios.doi.gov)>  
**Date:** May 19, 2017 at 7:13:11 PM MDT  
**To:** Nikki Moore <[nmoore@blm.gov](mailto:nmoore@blm.gov)>  
**Cc:** Michael Nedd <[mnedd@blm.gov](mailto:mnedd@blm.gov)>, Kathleen Benedetto <[kathleen\\_benedetto@ios.doi.gov](mailto:kathleen_benedetto@ios.doi.gov)>, John Ruhs <[jruhs@blm.gov](mailto:jruhs@blm.gov)>, Peter Mali <[pmali@blm.gov](mailto:pmali@blm.gov)>, "McAlear, Christopher" <[cmcalear@blm.gov](mailto:cmcalear@blm.gov)>, Sally Butts <[sbutts@blm.gov](mailto:sbutts@blm.gov)>, "Fisher, Timothy" <[tjfisher@blm.gov](mailto:tjfisher@blm.gov)>, Kristin Bail <[kbail@blm.gov](mailto:kbail@blm.gov)>, Aaron Moody <[aaron.moody@sol.doi.gov](mailto:aaron.moody@sol.doi.gov)>, Matthew Allen <[mrallen@blm.gov](mailto:mrallen@blm.gov)>, Edwin Roberson <[eroberso@blm.gov](mailto:eroberso@blm.gov)>, salt <[abilbao@blm.gov](mailto:abilbao@blm.gov)>  
**Subject: Re: GSENM Executive Summary and Initial Data Request**

Thank you. Will likely have some questions Monday, but great job.

Begin forwarded message:

**From:** Nikki Moore <[nmoore@blm.gov](mailto:nmoore@blm.gov)>  
**Date:** May 19, 2017 at 5:57:33 PM MDT  
**To:** [randal\\_bowman@ios.doi.gov](mailto:randal_bowman@ios.doi.gov)  
**Cc:** [mnedd@blm.gov](mailto:mnedd@blm.gov), [kathleen\\_benedetto@ios.doi.gov](mailto:kathleen_benedetto@ios.doi.gov), [jruhs@blm.gov](mailto:jruhs@blm.gov), Peter Mali <[pmali@blm.gov](mailto:pmali@blm.gov)>, [cmcalear@blm.gov](mailto:cmcalear@blm.gov), Sally Butts <[sbutts@blm.gov](mailto:sbutts@blm.gov)>, [tjfisher@blm.gov](mailto:tjfisher@blm.gov), [kbail@blm.gov](mailto:kbail@blm.gov), [aaron.moody@sol.doi.gov](mailto:aaron.moody@sol.doi.gov), [mrallen@blm.gov](mailto:mrallen@blm.gov), [eroberso@blm.gov](mailto:eroberso@blm.gov), salt <[abilbao@blm.gov](mailto:abilbao@blm.gov)>  
**Subject: GSENM Executive Summary and Initial Data Request**

Hi Randy,

We have completed our review of the initial responses provided in response to the April 26, 2017 Executive Order 13792 and initial data request. The executive summary and detailed response for the requested items are attached and will be uploaded to the respective Google Drive folder for the Grand Staircase-Escalante National Monument in addition to the supporting data and documents.

Per your request, I have also attached the additional information in a word document below and will shared the google docs that provide the supporting data and information.

Please let me know if you have any questions.

Hope you have a great weekend!

**New Information Requested on Executive Order on the Review  
of Designations Under the Antiquities Act**

**BLM-Utah Responses to Additional Questions**

- a) Any legislative language, including legislation in appropriations bills

There is no specific legislation regarding Grand Staircase-Escalante National Monument (GSENM).

- b) alternative options available for protection of resources applicable at each monument, such as Native American Graves Protection and Repatriation Act, Paleontological Resources Preservation Act, Archaeological Resources Protection Act, Historic Preservation Act and agency-specific laws and regulations.

The following options could provide some options to protect specific resources found in GSENM. Protection would likely occur on a site-by-site or resource-by-resource basis and also would take a significant amount of time to accomplish under these various laws. These laws may not provide a mechanism to protect all cultural or tribal resources in GSENM. For example, there are no statutory protections for cultural landscapes, but such resources could be protected under the Antiquities Act. See also the attached *Stegner Center NM vs NCA.pdf*.

National Historic Preservation Act, (NHPA)

Native American Graves Protection and Repatriation Act, (NAGPRA)

Paleontological Resources Preservation Act, (PRPA)

Archaeological Resources Protection Act, (ARPA)

American Indian Religious Freedom Act (AIRFA)

- c) Designated wilderness areas (name, acreage), Wilderness Study Areas (name if there is one, acreage, type), and/or areas managed to preserve wilderness or roadless characteristics that are not WSAs.

1. There is no designated wilderness within GSENM.
2. There are 16 Wilderness Study Areas totaling 881,997 acres within GSENM.
  - Phipps-Death Hollow Instant Study Area (ISA) - 42,731 acres
  - Steep Creek Wilderness Study Area (WSA) - 21,896 acres
  - North Escalante Canyons/The Gulch ISA - 120,204 acres
  - Carcass Canyon WSA - 47,351 acres
  - Scorpion WSA - 35,884 acres
  - Escalante Canyons Tract 1 ISA - 360 acres

- Escalante Canyons Tract 5 ISA - 760 acres
  - Devils Garden ISA - 638 acres
  - The Blues WSA - 19,030 acres
  - Fiftymile Mountain WSA - 148,802 acres
  - Death Ridge WSA - 63,667 acres
  - Burning Hills WSA - 61,550 acres
  - Mud Spring Canyon WSA - 38,075 acres
  - The Cockscomb WSA - 10,827 acres
  - Paria/Hackberry and Paria/Hackberry 202 WSA - 135,822 acres
  - Wahweap WSA - 134,400 acres
    - *WSA/ISA acres listed are the total BLM-administered surface acres from the Utah Statewide Wilderness Study Report, October 1991. GIS calculations would vary.*
3. The most recent comprehensive inventory of lands with wilderness characteristics within GSENM is Utah's statewide inventory effort in 1999. Within GSENM there are approximately 471,700 acres of lands with wilderness characteristics. GSENM completed a Monument Management Plan in 2000, but did not make specific land use planning decisions regarding the management of lands with wilderness characteristics. Instead, the MMP designates lands within the GSENM in different "Management Zones," to help define permitted or excluded activities and any stipulations pertaining to them. There are four types of Management Zones in GSENM: Frontcountry, Passage, Outback and Primitive. Lands with wilderness characteristics that are within the Outback or Primitive zones are managed according to goals and objectives that more closely align with protection of wilderness characteristics

*See attached maps: GSENM PassageZone LWC WSA.pdf; GSENM OutbackZone LWC WSA.pdf; GSENM FrontcountryZone LWC WSA.pdf; GSENM PrimitiveZone LWC WSA.pdf and GSENM FEIS WSAmap.jpeg.*

d) Outstanding R.S. 2477 claims within a monument – type of road claimed and history

There are ~1,525 roads claimed in Garfield and Kane counties under R.S. 2477. This figure also includes lands outside of GSENM managed by the Kanab Field Office. (*See: Statewide RS2477 Claims 102313.pdf; Utah RS2477Claims.pdf and Snapshot GSENMRS2477Claims.jpg*). Between 2005 and 2012, the State of Utah and 22 counties filed 30 lawsuits seeking quiet title to over 12,000 claimed R.S. 2477 rights-of-way. The vast majority of these claims are on BLM-administered lands, but claims are pending on lands administered by the National Park Service and U.S. Forest Service. To date, only one case, involving three roads, has been settled (Juab 1). Under a case management order, six cases involving 1,500 claims statewide are currently being litigated —Kane (1), Kane (2), (3), and (4), and Garfield (1) and (2). Of the 1,500 claims, approximately half are located in Grand Staircase Escalante National Monument. The remaining cases have been stayed, although preservation depositions have been allowed to continue. BLM-Utah maintains thousands of records related to R.S. 2477 claims and active or pending litigation, but some of the information is attorney-client privileged.

## e) Maps –

GSENM provided multiple maps in the initial data response (*2.g.1 GSENM SiteDensity.pdf; 2.g.2 GSENM Inventories.pdf; 2.g.3 GSENM ArchSites.pdf; 2.g.4 GSENM ArchNumofSites.pdf; 2.b.Upper Valley Field Map.pdf; GSENM Background Info subfolder- GSENM Brochure Map.pdf; MAP WSA for MMP DEIS Map.pdf; GrandStaircaseEscalante map.pdf; Paleo CulturalSitesMap5-8-17.pdf; PaleoSitesMap5-8-17.pdf*). There are also numerous maps contained within the Monument Management Plan. We are attaching the *GSENM ManagementZones Transportation Map.pdf*.

## f) Cultural or historical resources, particularly Tribal, located near a monument but not within the boundary that might benefit from inclusion in the monument

- Nipple Lake: Private inholding within GSENM. Landowner in the past has expressed interest in selling this property. This is considered a Traditional Cultural Property (TCP) by the Kaibab Paiute, in conjunction with the nearby Mollies Nipple land form (a prominent, isolated rocky peak), known to the Kaibab Paiute as "Mountain that Breathes. It is the only permanently wet meadow within GSENM, providing for a very unique habitat. The area is very dense in cultural sites, early ancestral pueblo occupation, and pilgrimage trails.
- Vermilion Cliffs Front: Kanab Field Office (KFO) and private land near the Kanab Creek boundary. Ancestral pueblo/archaeological record; site is contiguous with GSENM; includes important Ancestral Puebloan (Anasazi) sites, including the earliest studied and reported in the area
- Paria River Canyon (between Vermilion Cliffs NM & GSENM; managed by KFO)
  - Includes pilgrimage trails for Hopi & Paiute. Archaeological sites in this area contain evidence of continued Hopi pilgrimage use long after abandonment by the Ancestral Pueblos (Anasazi). (Note: This is also the location of Buckskin Gulch, one of the longest continuous slot canyons in the world, and the famous "Wave" formation).
- Shinarump Cliffs: KFO & private inholdings: Very dense array of Ancestral Puebloan (Anasazi) sites, including the earliest dated pottery in the area. The archaeological record here is equal to that at Grand Gulch.

(See: *GSENM Data call CulturalOutsideGSENM.pdf* and *Stoffle et al 2001 Kaibab Paiute Ethnographic Assessment in GSENM.pdf*)

## g) Other – general questions or comments

- a) **Discuss the full range of Proclamation objects.** The initial DOI data call focuses almost exclusively on cultural objects, but the Proclamation identifies many objects of antiquity or historical or scientific interest to be protected. GSENM published a table of all resources and objects in the Analysis of the Management Situation for the Livestock Grazing Plan Amendment EIS (*GSENM AMS Final July2015.pdf*, starting on pg.136). Objects within GSENM include geologic stratigraphy and structures, paleontological sites, cultural use, human history and biological resources. Each annual Manager's Report also notes the status and trend of the identified objects. We included the 2014, 2015, and 2016 Manager's Report in the GSENM Background Info subfolder in Drive. The Science

Symposium subfolder in Drive also summarizes some of the scientific studies on GSENM. The paleontological resources on GSENM are particularly noteworthy and world class. See attached: *Paleontology on the GSENM Titus.docx* and *GSENM Fossil Map.pdf*.

- b) **Extent of the designation:** The GSENM designation was the subject of litigation. The case concerned the designation of 1.7 million acres of federal land as a national monument pursuant to the Antiquities Act. The court held that the President complied with the Antiquities Act by (1) designating, in his discretion, objects of scientific or historic value, and (2) setting aside, in his discretion, the smallest area necessary to protect the objects. (*See: Utah Ass'n of Counties v. Bush.pdf* and *2004-04-19 Opinion & Order.pdf*)

In order to project the objects identified in the Proclamation, the Department must consider the connectivity between them. This concept is particularly critical for biological resources, but also applies to management of cultural resources and tribal interests. Protection of isolated identified cultural sites is not synonymous with protection of a cultural landscape (e.g., Traditional Cultural Properties, vision quest sites, etc.) The Secretary memo to the President articulates the rationale for the GSENM boundaries based on these factors and considerations. (*See: 7.2 8-15-96 Secretarial Memo.pdf* in Drive)

- c) **Monument Advisory Committees (MACs).** MACs provide for local and subject matter expert input and advice into management objectives. The GSENM MAC includes seven scientist positions that focus on the identified objects in the Proclamation. (*See: May 11, 2017 DOI MAC Data Call.docx*). For those Monuments that do not have MACs, the RACs provide that same level of integrating multiple stakeholders in an advisory capacity.
- d) The designation of GSENM as a national monument elevates protection of the identified objects in many ways, including:
- Increased attention and public awareness of resources and objects
  - Expanded educational/research efforts by employees and researchers related to these objects
  - Increased partnership opportunities and funding via Universities that focus on research in Monuments

## **Executive Summary of Review of National Monuments under EO 13792 (April 26, 2017)**

### **Key Information about Grand Staircase Escalante National Monument**

Grand Staircase-Escalante National Monument (GSENM), established by Presidential Proclamation on September 18, 1996, was the BLM's first national monument. Prior to designation, the area was managed by the BLM and continues to be following designation. The BLM manages for multiple use within the Monument (hunting, fishing, recreation, grazing, and valid existing rights such as oil production, etc.), while protecting the vast array of historic and scientific resources identified in the Proclamation and providing opportunities for scientific study of those resources. The resources identified in the Proclamation include geologic features of exposed stratigraphy and structures, renowned paleontological sites, archaeological sites that demonstrate extensive use of the area by ancient Native American cultures with thousands of recorded cultural sites, a rich expanse of human history, and five life zones of outstanding biological resources. Overall, multiple use activities are allowed in GSENM that are compatible with the protection of resources and objects identified in the Presidential Proclamation. Multiple-use activities are subject to decisions made in current and future BLM resource management planning efforts which include public participation. National Monuments and other conservation areas managed by the BLM continue to allow for multiple uses according to the Federal Land Policy and Management Act (depending on proclamation language).

### **Summary of Public Engagement Prior to Designation**

GSENM was designated in 1996 without public engagement. However, the area in southern Utah had long been considered, discussed and evaluated for the possibility of providing greater recognition of and legal protection for its resources. In 1936, the National Park Service (NPS) considered making a recommendation to President Roosevelt to designate a 6,968 square mile "Escalante National Monument" (which also extended to portions of Bears Ears National Monument). A second NPS proposal proposed a 2,450 square mile National Monument (Background folder-Google Drive). In the late 1970s, under the authority of Section 603 of the Federal Land Policy and Management Act of 1976 (FLPMA), the BLM evaluated the area for its wilderness characteristics. The Section 603 process ultimately led to the establishment of more than a dozen wilderness study areas (WSAs), totaling about 900,000 acres, in the area that is now GSENM.

### **Summary of Public Scoping in Development of Resource Management Plan**

GSENM's Monument Management Plan included substantial outreach, public scoping and comment periods according to land use planning regulations and policies. Over 6,800 individual letters were received during the public scoping period. Similar public outreach efforts are underway for the Livestock Grazing Monument Management Plan Amendment and Environmental Impact Statement.

### **Summary of National Monument Activities since Designation**

In the 20 years since Grand Staircase-Escalante National Monument was designated, a wealth of scientific knowledge has been discovered, with significant archaeological, paleontological, biological, ecological and geological discoveries on the Monument. The Kaiparowits Plateau contains a plethora of

paleontological specimens: twelve new dinosaur species have been discovered since designation. The scientific research and discoveries were outlined and highlighted through a series of three “Learning from the Land” Symposiums, in 1997, 2006 and 2016 (Symposium folder on Google drive). A Monument Management Plan was completed in 2000, ensuring continued management of multiple uses and valid existing rights. Recreational use, including commercial Special Recreation Permits has increased substantially. GSENM provides visitor services and information at four visitor centers in neighboring towns to support the increasing visitor and commercial use on the Monument and to foster tourism in gateway communities. A summary of GSENM activities for 2016 can be found in the Monument Manager’s Report in the Background folder on the google drive.

### **Summary of Activities in Area for Five years Preceding Pre-Designation**

Prior to the 1996 designation of GSENM, the public land was managed by the Bureau of Land Management, within two resource areas: the Kanab Resource Area and the Escalante Resource Area. The lands were used primarily for scientific study, primitive recreation and livestock grazing. Overall permitted livestock grazing use within the Monument is at roughly the same level now as it has been since the early 1990s. When the Monument was designated, there were 106,645 total Animal Unit Months (AUMs), with 77,400 of these active. Today, there are 106,202 total AUMs and 76,957 are active. In 1999, an adjustment in AUM levels was made to resolve riparian resources issues and address recreation conflicts. In October 1991, the Utah Statewide Wilderness Study Report was submitted to Congress. Within that recommendation, 881,997 acres within 16 WSAs were included within the area that would become GSENM (47 percent of the Monument). Under Section 603 of FLPMA, the BLM manages WSAs so as not to impair the suitability of such areas for preservation as wilderness.

### **Summary of Available Economic Information since Designation**

Visitors to GSENM generated \$60,637,361 expenditures creating additional 1,024 non-federal jobs within the region for a total economic output of \$91,476,382 (reference FY 2016 Economic Snapshot). Economic research by external parties has been completed and includes GSENM-specific information in several reports including the 2016 Economic Snapshot-Grand Staircase-Escalante National Monument, the 2011 and 2014 Headwaters Economic Report, and a 2004 research paper by Dr. Steven Burr, Director of the Institute for Outdoor Recreation and Tourism at Utah State University. In addition, a Socioeconomic Baseline Report was completed for the Livestock Grazing Plan Amendment EIS in 2015. These documents, along with additional economic research, are provided in the Economic subfolder in Google Drive.

### **Summary of Any Boundary Adjustments since Designation**

Since designation, there have been two congressional boundary adjustments as well as an exchange of all of the State of Utah School and Institutional Trust Lands Administration (SITLA) lands within the Monument boundaries. When the Monument was designated, it encompassed 1,878,465 acres. In 1998, H.R. 3910, the Automobile National Heritage Area Act (Public Law 105-355), resulted in a boundary change to 1,884,011 acres, a net gain of approximately 5,546 acres. In 2009, H.R. 377, the Omnibus

Public Land Management Act (Public Law 111-11), directed a boundary change and purchase for the Turnabout Ranch, resulting in the removal of approximately 25 acres from GSENM. The Utah Schools and Land Exchange Act of 1998 exchanged State/SITLA lands within the boundaries of GSENM. The federal government received all State inholdings in GSENM (176,699 acres) while the State received \$50 million in cash plus \$13 million in unleased coal and approximately 139,000 acres, including mineral resources. The federal government received additional State holdings within other NPS and US Forest Service units as part of the same exchange.

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[Grand Staircase-Escalante-20170519T212630Z-001.zip](#)

[GSENM Data\\_call\\_CulturalOutsideGSENM.pdf](#)

[GSENM Fossil Map.pdf](#)

[GSENM ManagementZones\\_Transportation Map.pdf](#)

[GSENM\\_FEIS\\_WSAmap.jpg](#)

[GSENM\\_FrontcountryZone\\_LWC\\_WSA.pdf](#)

[GSENM\\_OutbackZone\\_LWC\\_WSA.pdf](#)

[GSENM\\_PassageZone\\_LWC\\_WSA.pdf](#)

[GSENM\\_PrimitiveZone\\_LWC\\_WSA.pdf](#)

[May 11, 2017 DOI MAC Data Call.docx](#)

[New information requested on EO 13792 Monuments...](#)

[Paleontology on the GSENM Titus.docx](#)

[Snapshot\\_GSENMRS2477Claims.png](#)

[Stoffle et al 2001 Kaibab Paiute Ethnographic A...](#)

**Call for Data Related to Review of National Monuments under EO 13792 (April 26, 2017)**

**1. Documents Requested**

**a. Resource Management Plans/Land Use Plans**

i. The Monument Management Plan (MMP) and Record of Decision (ROD) is located within this Drive

folder (1.GSENM\_mgmt\_plan.pdf).

ii. The entire GSENM RMP (DEIS/FEIS/ROD) can be accessed here:

<https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage&currentPageId=94418>

iii. The Livestock Grazing EIS/Plan Amendment has been initiated. The DEIS has been reviewed by the BLM Utah State Office and BLM Washington Office and is nearing public release: <https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage&currentPageId=100826>

iv. The MMP has also been amended for Greater Sage Grouse habitat conservation (2015), for an electrical transmission line Right-of-Way to support local communities (2011), and for an update to fire management (2005).

**b. Record of Decision**

i. The 1999 MMP and ROD is located within this Drive folder (1.GSENM\_mgmt\_plan.pdf).

**c. Public Scoping Documents**

i. Grand Staircase-Escalante National Monument's (GSENM) Management Plan included substantial outreach, public scoping and comment periods according to land use planning regulations and policies. See Federal Register Notices in Drive folder (1.c.Federal Register, Volume 64 Issue 145 (Thursday, July 29, 1999).pdf).

ii. Public Comments and Responses for the MMP FEIS are located within this Drive folder (1.c.GSENM\_FEIS\_Comments.pdf).

iii. See also Scoping Report for Livestock Grazing EIS (1.c.GSENM\_GrazingEISScopingRpt\_Final.pdf) and at:

[https://eplanning.blm.gov/epl-front-office/projects/lup/69026/89803/107384/2014.05.21\\_GSENM\\_ScopingRpt\\_Final\\_508.pdf](https://eplanning.blm.gov/epl-front-office/projects/lup/69026/89803/107384/2014.05.21_GSENM_ScopingRpt_Final_508.pdf)

iv. GSENM worked with multiple agencies, tribes and communities and individuals

and responded to more than 6,800 letters commenting on the 2000 MMP. Nearly all site-specific NEPA analyses include public comment periods. Additionally, GSENM has offered multiple opportunities for public engagement in the Livestock Grazing Plan Amendment/EIS including:

- Development of a Situation Assessment by National Riparian Service Team
- Hosted 12 public scoping meetings and/or workshops
- Hosted 3 Socio-economic workshops
- Five newsletters developed along with a “Fact Sheet Series”
- Press releases published in five Utah newspapers
- Maintained Project website with project updates
- Hosted a Biological Soil Crust Forum
- Public Release of Draft Alternatives
- The inclusion of two Action Alternatives in the PDEIS that were derived from external sources
- Hosted 27 Cooperating Agency Meetings; 12 Forage Team Meetings
- Outreach to local tribes
- Monument Advisory Committee Input
- Joint BLM/NPS Programmatic Agreement for Cultural Resources
- Broad Consulting Party Process
- Other meetings: County Coordination, State of Utah, Earthfest

GSENM demonstrates a commitment to continued public engagement in land use planning processes.

d. Presidential Proclamation

- i. Proclamation 6920 of September 18, 1996 is in this folder  
(1.d.Presidential\_Proclamation\_6920.pdf).

2. Information on activities permitted at the Monument, including annual levels of activity from the **date of designation to the present**

**Designation date for GSENM is September 18, 1996.**

a. Recreation - annual visits to site

- i. To protect Monument resources and objects and to provide economic opportunities in the local communities, major facilities including the four visitor centers are located in the gateway towns of Kanab, Cannonville, Escalante, and Bigwater.
  - ii. GSENM provides a large variety of multiple-use recreation opportunities including traditional hiking and camping, hunting, fishing, horseback riding, mountain biking, as well as motorized activities for off-highway vehicles.
  - iii. Commercial recreation activities (Outfitter and Guides) have risen since Monument designation (2.a.\_GSENM Commercial\_SRP.pdf).
  - iv. In 2016, 926,235 million visitors came to GSENM.  
GSENM uses the Recreation Management Information System (RMIS) to report visitor use, which is calculated using data from multiple traffic counters, permits and visitor counts in the four Visitor Centers. BLM's Recreation Management Information System (RMIS) is generally accepted as the agency's official record, however, RMIS was not available until 1999. Prior to 1999, GSENM aggregated data from the Kanab and Escalante offices. (See:  
2.a.GSENM\_RecreationData\_Excel.xls and  
3.a.GSENM\_Recreation\_MMP\_DEIS\_Tables.pdf)
- b. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)
- i. All Valid Existing Rights for leasable minerals including coal, and oil and gas are continued.
  - ii. No new leases have been issued since designation. GSENM has no commercial renewable energy.
  - iii. The annual production of oil and gas in the GSENM is currently limited to lands in or adjacent to the Upper Valley Unit (UVU) in the north-central area of the GSENM (Attachments: 2.b.Upper Valley Unit Map.pdf; 2.b.Upper Valley GSE Production.pdf; 2.b.Upper Valley Wells in GSENM.xls; and 2.b.UDOGM\_O&Gprod\_data\_Upper Valley.pdf). GSENM shares the Upper Valley Oil Field with the Dixie National Forest; this field accounts for all oil and gas production in GSENM. Attached documents disclose production for the Upper Valley Field. Four wells within the GSENM are currently producing oil and a small amount of gas. The UVU was approved in 1962 and production from the wells peaked in 1972 at 183,133 barrels. In the last 20 years (1997-2016) production

has slowly declined from about 65,828 barrels of oil and no gas annually to 45,538 barrels of oil and 2,357 thousand cubic feet (mcf) of gas. There is no other oil and gas production in GSENM, or Kane and Garfield Counties.

- iv. No coal lands have been explored or coal produced within the GSENM since the September 18, 1996 designation. Existing coal leases were voluntarily exchanged for Federal payments totaling \$19.5 million (not adjusted for inflation) (2.b.GSENM Coal Lease Cancellation Payments.pdf)
- v. 34 oil and gas leases (45,894 acres) are in suspension while a Combined Hydrocarbon Lease (CHL) conversion application is processed.
- vi. Information related to energy transmission infrastructure and lands and realty actions is included in the table below:

Grand Staircase-Escalante National Monument Existing Rights-of-Way/Permits/Authorized 09/25/1996 05/15/2017	
Existing Withdrawals: PSR, PWR, Bureau of Reclamation, Forest Service Wilderness, Power Site, National Park Service, In Trust for Indians	17
Road ROWs	19
Misc. Roads and Associated Uses - Sec 107 Federal Aid Hwy, Revised Statute 2477, Mineral Material Sites	0
Power Transmission Lines and Power Facilities	20
Communication Sites Telephone, Telegraph, Radio Transmission, Global Positioning Systems	15
Water ROWs, Irrigation Facilities	14
Oil and Gas Pipelines, Oil and Gas Facilities	5

Other FLPMA ROWs, Perpetual Easements, Federal Facilities	2
Airport	0
Permit - 302 FLPMA Misc.	0
Permits Film - 302 FLPMA (popular location (closed))	54

c. Minerals - annual mineral production on site

i. Mineral materials

- No new Free Use, commercial, or over-the-counter permits have been issued since Monument designation.
- Valid existing permits, including those in Title 23 (3 Federal Highway Rights of Way), continue to be recognized until permit expiration.
- Significant quantities of gravel and riprap from existing pits continue to be provided for Federal Highways projects, primarily to Utah Department of Transportation.
- According to UGS Circular 93, January 1997, “A Preliminary Assessment of Energy and Mineral Resources within the Grand Staircase-Escalante National Monument” (2.c.UGS Circular 93 GS Energy and Mineral Resources.pdf) there were five small mining operations on unpatented mining claims, four of which were active alabaster quarries and one, a suspended operation for petrified wood. Annual production of the alabaster was about 300 tons worth \$500 per ton (\$150,000/yr). These claimants failed to pay the required annual filings and therefore, the claims were terminated. The BLM’s decision to close the claims was upheld by IBLA in March 2008. Since that time, there have been no mining law operations within the monument.

ii. Locatable Minerals

- No new mining claims were issued after Monument designation, however existing claims and active mines were allowed to continue. (List of active mines in MMP DEIS located within this Drive folder 2.c. MMP\_DEIS Table 3.10\_Locatables.pdf).

- d. Timber - annual timber production on site (in board-feet, CCF, or similar measure)
  - i. No commercial timber production pre/post Monument designation.
  - ii. GSENM does allow continued firewood cutting in two forestry product areas.
- e. Grazing - annual grazing on site (AUMs active and billed)
  - i. Grazing on the Monument Fact Sheet (2.e\_GSENM Grazing EIS Fact Sheet 05-08-2017.pdf).
  - ii. Grazing AUMs/ Active and billed (2.e.\_GSENM Grazing AUMs).
  - iii. When the Monument was designated, there were 106,645 total AUMs, with 77,400 of these active. Today, there are 106,202 total AUMs and 76,957 are active. In 1999, an adjustment in AUM levels was made to resolve riparian resources issues and address recreation conflicts. In the current Livestock Grazing EIS/Plan Amendment process the current preferred alternative will have a slight reduction with 105,765 AUM but an increase of total acres for grazing within the monument.
- f. Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available
  - i. **Subsistence activities** are those that provide the bare essentials for living: food, water, and shelter. The Federal Subsistence Management Program provides opportunities for subsistence way of life in Alaska on federal public lands and waters. There are no formal subsistence programs outside of Alaska. There are no known true subsistence activities occurring on GSENM or prior to its designation. GSENM does provide for the collection of certain natural materials by Native American Indians, under BLM permit. RMIS data provides the number of permitted/guided and recreational hunting activities, fishing activities and gathering activities (See: 2.a.GSENM\_RecreationData\_Excel.xls). These numbers do not reflect the actual number of licensed hunters/fishermen. That data is available from the State of Utah Division of Wildlife Resources. Outside of developed recreation sites, the entire GSENM is open for hunting and fishing, which is regulated by the State of Utah Division of Wildlife Resources.
- g. Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available
  - i. Archeological/cultural data is provided in the following Utah Division of State History Maps in the google drive (2.g.1\_GSENM\_SiteDensity,

- 2.g.2\_GSENM\_Inventories, 2.g.3\_GSENM\_ArchSites,  
2.g.4\_GSENM\_ArchNumofSites).
- ii. Archaeological surveys carried out to date, show extensive use of places within the monument by ancient Native American cultures and a contact point for Anasazi and Fremont cultures. The cultural resources discovered so far in the monument are outstanding in their variety of cultural affiliation, type and distribution. Hundreds of recorded sites include rock art panels, occupation sites, campsites and granaries. Cultural sites include historic and prehistoric sites, Traditional Cultural Properties, Native American Sacred Sites and cultural landscapes.
  - iii. According to the Utah State Historic Preservation Office (SHPO), as of March 6, 2017, there are 3,985 recorded archaeological sites within the Grand Staircase-Escalante National Monument (GSENM)(2.g.4\_GSENM\_ArchNumofSites). However, the GSENM staff estimates that there are more likely around 6,000 recorded archaeological sites within the GSENM, due to a records backlog. This is with only five to seven percent of the Monument surveyed.
  - iv. Cultural Values (Tribal): Prehistoric archaeological sites in the GSENM include pottery and stone tool (lithic) scatters, the remains of cooking features (hearts), storage features such as adobe granaries and subsurface stone lined granaries, prehistoric roads, petroglyphs, pictographs and cliff dwellings. Historic sites include historic debris scatters, roads, trails, fences, inscriptions, and structures. Following the designation of GSENM, consultations were initiated with the Native American tribes associated with the GSENM area, including the Hopi, the Kaibab Paiute, the San Juan Paiute, the Paiute Indian Tribes of Utah, the Zuni, and the Ute, and the Navajo. Over the past 20 years, the Hopi and the Kaibab Paiute have been most closely associated with the Monument and most responsive to continued consultations, as the GSENM area is central to the historic and prehistoric territories of these two tribes. All tribes considered the Monument area to be culturally important; the Hopi (as the modern descendants of the Ancestral Puebloans), for example, can trace the migrations of at least twelve clans through what is today GSENM (Bernardini 2005). The tribal connections to this land are probably best described by an example from the Kaibab Paiute, as related to ethnographers from the University of Arizona, as follows (Stoffle et al 2001): "*The Southern Paiute people continue to maintain a*

*strong attachment to the holy lands of their ethnic group as well as to their own local territory. These attachments continued even though Paiute sovereignty has been lost over portions of these lands due to Navajo ethnic group expansion, encroachment by Euro Americans, and Federal government legislation. Despite the loss of Paiute sovereignty over most traditional lands, Southern Paiute people continue to affiliate themselves with these places as symbols of their common ethnic identity. Additionally, all Southern Paiute people continue to perform traditional ceremonies along with the menarche and first childbirth rites of passage rituals. The locations at which these ceremonies and rituals have been or are currently performed become transformed from secular "sites" to highly sacred locations or places. By virtue of the transformation of locations into sacred places, Southern Paiute people reaffirm their ties to traditional lands because they have carried out their sacred responsibilities as given to them by the Creator."*

- v. **Cultural values (Ranching)** Local ranching began in the 1860s, and became a major focus of area livelihood and increased settlement in the 1870s. Ranching was initially small scale and for local subsistence, but the herds quickly grew so that by the late 1800s the raising of cattle, sheep, and goats was of major economic importance. Ranching and subsistence farming was historically the backbone of the local economies, and this is still reflected in the views of the modern communities surrounding GSENM. In modern times the economic importance of ranching has somewhat diminished, but the culture of, and past history of, livestock grazing and ranching is one of the important "glues" that binds local communities and families in the GSENM area.

### 3. Information on activities occurring during the **five years prior to designation**

- a. Recreation - annual visits to site
  - i. The BLM transitioned to RMIS in 1999. Data prior to 1999 is not available in the same reporting mechanism as from 1999-Present. GSENM did report visitor use beginning in FY97. (See: 2.a.GSENM\_RecreationData\_Excel.xls and 3.a.GSENM\_Recreation\_MMP\_DEIS\_Tables.pdf).

Overall visitation increased prior to designation and the projecting trends based on the historical information would see a continued rise of visitors seeking recreational opportunities. Just prior to designation Escalante Canyon received

373,200 visitors in 1994, 384,800 visitors in 1995 and 456,400 in 1996.

- b. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)
  - i. The Upper Valley Oil Field was in production prior to designation; no other oil and gas production existed in Kane and Garfield Counties. From 1992 until 1996, 336,313 barrels of oil were produced in the GSENM. No natural gas was produced during that time. (2.b.Upper Valley GSE Production.pdf).
  - ii. No coal was produced from the GSENM in the five years preceding designation. A regional analysis/FEIS for mining was completed in 1979 (3.b.FINAL EIS - Dev of Coal Resources in Southern Utah Title Pages.pdf). Exploration activities and planning for mining operations continued from the 1980's until the monument designation.
    - 64 coal leases (~168,000 acres) were committed and a plan was submitted for Andalex Resources' Smoky Hollow Mine. The plan proposed mining on 23,799 acres of the area leased in GSENM. In the mid-1990's an EIS was initiated (3.b.4.b.Warm Springs Smoky Hollow PDEIS December 1995\_Coveronly.pdf).
    - 600+ exploration drill holes were completed prior to GSENM designation to define the coal geology to plan for underground mines (See 3.b.BLM 1996-1997 Kaiparowits Coal Report - DRAFT.pdf and <https://pubs.usgs.gov/of/1996/OF96-539>)
  - iii. Information related to energy transmission infrastructure and lands and realty actions is included in the table below:

Grand Staircase-Escalante National Monument Existing Rights-of-Way/Permits/All Dispositions Authorized/Closed/Relinquished/Withdrawn/Expired/Terminated/Cancelled/Pending/ Rejected/Void	
01/01/1991   09/24/1996	
<i>(In March 1999, BLM added Case Recordation components to the LR2000 Database System; therefore, some of the pre-LR2000 data may remain in the Status Database)</i>	

Existing Withdrawals: PSR, PWR, Bureau of Reclamation, Forest Service Wilderness, Power Site, National Park Service, In Trust for Indians	1
Roads ROWs	8
Misc. Roads - Sec 107 Federal Aid Hwy, RS2477, Mineral Material Sites	1
Power Transmission Lines & Power Facilities	1
Communication Sites Telephone, Telegraph, Radio Transmission, Global Positioning Systems	1
Water ROWs, Irrigation Facilities	0
Oil & Gas Pipelines, Oil & Gas Facilities	2
Other FLPMA ROWs, Perpetual Easements, Federal Facilities	6
Airport	0
Permit - 302 FLPMA Misc.	25
Permits Film - 302 FLPMA (popular location (closed))	0

- c. Minerals - annual mineral production on site
  - i. The alabaster quarries were the only authorized locatable minerals operation (dating to 06/30/1986) in the area prior to designation.
  - ii. Mineral materials, primarily sand and gravel and riprap, were extracted from developed pits by counties and commercial entities for local use. There were eight Mineral Material Cases in the monument at designation, and most were Free Use Permits granted to the county.
- d. Timber - annual timber production on site (in board-feet, CCF, or similar measure)
  - i. No commercial timber production pre/post Monument designation.
  - ii. Prior to designation, the Kanab and Escalante Resource Areas were open to firewood cutting.
- e. Grazing - annual grazing on site (AUMs active and billed)
  - i. Grazing on the Monument Fact Sheet (2.e\_GSENM Grazing EIS Fact Sheet 05-08-2017.pdf).
  - ii. Grazing AUMs/ Active and billed (2.e.\_GSENM Grazing AUMs)
  - iii. When the Monument was designated, there were 106,645 total AUMs, with 77,400 of these active. Today, there are 106,202 total AUMs and 76,957 are active. In 1999, an adjustment in AUM levels was made to resolve riparian resources issues and address recreation conflicts. The current Livestock Grazing EIS/Plan Amendment process the current preferred alternative will have a slight reduction with 105,765 AUM but an increase of total acres for grazing within the monument.
- f. Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available
  - i. There are no known true subsistence activities occurring on GSENM or prior to its designation. Recreational fishing, hunting and gathering data from RMIS is not available prior to designation.
- g. Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available
  - i. In the five year period prior to designation of GSENM, a total of approximately 358 cultural resource sites were documented in what was to become GSENM, or about 72 sites/year. Following designation, approximately 3,219 sites were documented, or about 161 sites/year. This increase reflects the increased

funding and greater research opportunities following GSENM designation.

- ii. In the five year period prior to designation of GSENM, a total of approximately 3991 acres of new cultural resource surveys were conducted in what was to become GSENM, or about 798 acres/year. Following designation, approximately 41,024 acres of new cultural resource surveys were conducted, or about 2051 acres/year. This increase reflects the increased funding and greater research opportunities following GSENM designation, as well as substantial habitat improvement projects.

**4. Information on activities that likely would have occurred annually from the date of designation to the present if the Monument had not been designated**

The answers to this question are speculative. The question is best answered with qualitative (rather than quantitative) data. As GSENM was designated 20 years ago, the factors affecting such projections are subject to a wide range of variables (many of which are outside of BLM's purview, such as market prices).

**a. Recreation - annual visits to site**

- i. Research by external parties (e.g., Headwaters Economics and Pew Trust reports) indicate that protected landscapes are a draw for visitors and do result in increased visitation to a region. Thus, it is reasonable to conclude that visitation would be less if the lands had not been designated as a monument.

**b. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)**

**Commercial speculation depends on the price of commodities.**

- i. Except for the Upper Valley Field, there have been no oil and gas discoveries within the GSENM. Forty-seven exploratory wells have been drilled; exploration activities were relatively sparse and cover an average of 57 square miles per well (2.c.UGS Circular 93 GS Energy and Mineral Resources.pdf, page iv).
- ii. An Application for a Permit to Drill (APD) was submitted for valid existing leases within the Circle Cliffs Unit. The APD was neither approved nor rejected and the lessee allowed the leases to terminate.
- iii. Four wildcat oil and gas wells have been drilled on GSENM since designation (1997-1999); none went into production.
- iv. Since there have been no discoveries upon which to base production numbers, estimates of the value of production vary widely. The Utah Geological Survey (UGS) projected 2.6 to 10.5 trillion cubic feet (2.6 to 10.5 billion mcf) of coal-bed

methane may be contained in the GSENM. The UGS also projected "...550 million barrels of oil might be contained within tar sands of the monument." In January 1997, it was speculated that total value of coalbed natural gas and petroleum within the GSENM ranged between \$2.02 and \$18.6 billion (2.c.UGS Circular 93 GS Energy and Mineral Resources.pdf).

- v. It is reasonable to conclude absent a national monument designation, the opportunities for additional oil and gas exploration, discovery and development would be based on the viability of development and the economic value and access to distribution.
- vi. The Kaiparowits plateau, located within the monument, contains one of the largest coal deposits in the United States. The USGS projected "an original resource" of 62 billion tons of coal with a geologic and mining technology adjusted resource of 30 billion tons (<https://pubs.usgs.gov/of/1996/OF96-539>). The DEIS for the Smoky Hollow Mine (3.b.4.b.Warm Springs Smoky Hollow PDEIS December 1995\_Coveronly.pdf) and the Alton coal mine producing from adjacent private lands provide an example of the development potential.
- vii. Andalex coal leases were voluntary sold to the Land and Water Conservation Fund (LWCF) at market value. At the time of designation, the Warm Springs Smoky Hollow DEIS was in progress to analyze the proposed mine. Andalex Resources may or may not have actually decided to develop the coal resources based on varying economic projections for the project, particularly the cost of transporting the coal.
- viii. The Utah Geological Service projected 11.36 billion tons are "technologically recoverable" (including 870 million tons in what was previously State of Utah School and Institutional Trust lands (SITLA)(2.c.UGS Circular 93 GS Energy and Mineral Resources.pdf). Recent advances in underground coal mining techniques would likely result in the development of additional large areas of Kaiparowits coal resources not considered minable in the 1990's.
- ix. The School Institutional Trust Lands Administration (SITLA) lands were exchanged for cash payments and federal coal and oil and gas properties outside the monument. Absent a monument designation, the federal/SITLA land exchange would likely not have occurred.
- x. Applications for rights of way and other energy transmission infrastructure may have continue to occur within the current monument boundaries including

opportunities for mineral development.

**c. Minerals - annual mineral production on site**

- i. Absent monument designation, it is likely relinquished alabaster claims may have been relocated and additional alabaster mining claims may have been filed. For the alabaster quarries, "Over a 30-year period, the quarries should generate \$4.5 million in production." (2.c.UGS Circular 93 GS Energy and Mineral Resources.pdf)
- ii. The Utah Geological Survey mineral report stated, "Various types of metallic-mineral deposits are known to be present in the monument (figure 14). Most of these are small and low-grade with uncertain likelihood of significant development." The report addressed specific minerals with known or potential deposits within the monument, but they determined at that time they were probably not commercial quality due to low, often subeconomic grades and limited tonnage. Thus, it is unlikely that metallic mining would have occurred. (2.c.UGS Circular 93 GS Energy and Mineral Resources.pdf)
- iii. There would most likely be additional mineral material sites for sand and gravel and the existing Free Use Permits granted to Kane County most likely still be in use.

**d. Timber - annual timber production on site (in board-feet, CCF, or similar measure)**

- i. There is little harvestable lumber on the Monument (a little more than 1,000 acres of ponderosa). The mill harvested trees from the surrounding Dixie National Forest. The closure of the mill in Escalante was not connected to timber harvest on BLM lands.

**e. Grazing - annual grazing on site (AUMs Active and billed)**

- i. Grazing/ AUMs active and billed would likely have remained the same.
- ii. Grazing is and was managed by applicable laws and regulations. As stated in the Proclamation; "Nothing in this proclamation shall be deemed to affect existing permits or leases for, or levels of, livestock grazing on Federal lands within the monument; existing grazing uses shall continue to be governed by applicable laws and regulations other than this proclamation."
- iii. Although grazing use levels have varied considerably from year to year due to factors like drought, no reductions in permitted livestock grazing use have been made as a result of the Monument designation.

- f. Subsistence - participation rates for subsistence activities occurring on site (fishing, hunting, gathering); quantities harvested; other quantifiable information where available
  - i. No likely changes or statistically significant differences from the reported RMIS data.
- g. Cultural - list of cultural uses/values for site; number of sites; other quantifiable information where available
  - i. Less inventory would have likely occurred without the Monument designation. The Resource Areas averaged about 72 sites/year inventoried. After designation, the average was about 161 sites/year.
  - ii. More vandalism would have likely occurred without Monument designation. After designation, research, inventory and educational and interpretive outreach programs increased. Between 1996 and 2006, GSENM presented more than 500 talks, classroom visits, field trips and other educational events relating to cultural resources and archeology. Education, increased presence of staff and researchers and improved management likely led to the reduction in numbers of sites looted and rock art panels defaced.
  - iii. Less archeological research would have occurred without the Monument Designation. Early GSENM efforts included initiating large, landscape surveys which recorded and documented hundreds of sites.

**5. Changes to boundaries - dates and changes in size**

- i. Monument Designation September 18, 1996 (1,878,465 acres).
- ii. H.R.3910, Automobile National Heritage Area Act, Public Law 105-355, Nov. 6, 1998, 112 Stat. 3253. 1,884,011 acres, net gain of approximately 5,546 acres (See 5.a.H.R.3910\_Automobile National Heritage Area Act Synopsis)
- iii. H.R.377, Public Law 111-11, 2009, Boundary change and purchase for Turnabout Ranch, approximately 25 acres removed from GSENM (See 5.c.GSENM\_Boundary\_SaleHR3777\_PL111-11\_Turnabout.pdf)
- iv. Utah Schools and Land Exchange Act 1998: State of Utah School and Institutional Trust Lands Administration lands within the boundaries of GSENM were exchanged. The Federal government received all State inholdings in GSENM (176,699 acres) while the State Received \$50 million plus \$13 million in unleased coal and approx 139,000 acres including mineral resources. The Federal Government received additional State holdings within other National

Park Service and US Forest Service units. (See 5.1998\_Utah school Land Exchange\_PL105-335.pdf)

- v. Small acquisitions of inholdings, private land located within the Monument boundary, have occurred since designation. The acquisitions have not resulted in boundary adjustments, but have increased total Federal land ownership. More information is available upon request.

#### **6. Public Outreach prior to Designation - outreach activities conducted and opportunities for public comment**

- i. No public outreach documents specifically related to the designation of Grand Staircase-Escalante National Monument are available. However, the area in southern Utah had long been considered, discussed and evaluated for the possibility of providing greater recognition of and legal protection for its resources. As early as 1936, the National Park Service (NPS) considered making a recommendation to President Roosevelt to designate a 6,968 square mile "Escalante National Monument."

#### **7. Terms of Designation**

- i. Refer to Proclamation for the terms of designation.
- ii. GSENM has additional data describing terms of the designation
  - Presidential remarks announcing the designation of GSENM (7.1\_Remarks Announcing GSENM\_pg1782-2).
  - Secretary of the Interior Memo to the President describing the objects and providing a listing of Monument Objects and a bibliography of Monument object data (7.2\_8-15-96 Secretarial\_Memo).
  - Secretary of the Interior Memo to the BLM Director describing Interim Management Direction for GSENM (7.3\_11-6-96 Secretarial\_Memo).